

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:16CR224
	:	
Plaintiff,	:	
	:	CHIEF JUDGE PATRICIA A. GAUGHAN
-vs-	:	
	:	
RADU MICLAUS,	:	<u>DEFENDANT'S MOTION FOR LEAVE</u>
	:	<u>TO FILE TRIAL EXHIBITS UNDER</u>
Defendant.	:	<u>SEAL FOR APPEAL PURPOSES</u>

Defendant Radu Miclaus through counsel, respectfully moves this Honorable Court for an order permitting the filing of trial exhibits entered in this case, under seal. The reason for this request is that counsel refers to the trial exhibits in her appellate brief, however, the exhibits contain personal information of alleged victims that should not be made public. Specifically, counsel wishes to file Government's Trial Exhibit numbers 1204, 1333, 2043, and 2044 under seal. Counsel states that oral argument in the appeal has been set for March 3, 2021, and therefore requests expedited ruling on this request.

Respectfully submitted,

STEPHEN C. NEWMAN
Federal Public Defender
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/s/ Catherine Adinaro Shusky
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